

UNITED STATES DISTRICT COURT

for the
District of Utah

FILED
2025 APR 22 PM 3:55
CLERK
U.S. DISTRICT COURT

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

One (1) USPS Priority Mail parcel bearing tracking
number 9505511638565109059034

Case No. 4:25-mj-00040 PK

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

The parcel; USPS Priority Mail parcel bearing tracking number 9505511638565109059034; More fully described in Attachment A.

located in the _____ District of _____ Utah _____, there is now concealed (identify the person or describe the property to be seized):

The parcel; parcel packaging and packing materials; any controlled substances; any currency which are evidence of violations of 21 USC, Sections 841(a)(1), 843(b), and 18 USC 1716 Nonmailable Matter.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 USC 1716	Non Mailable Matter
21 USC 841	Possession or Distribution of a Controlled Substance
21 USC 843	Unlawful Use of the Mail to Distribute Controlled Substance(s)

The application is based on these facts:

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Solomon Ettinger

Applicant's signature

Solomon Ettinger, USPS TFO

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by _____
(specify reliable electronic means)

Date: 04/22/2025

City and state: St. George, Utah

Judge's signature

Paul Kohler, United States Magistrate Judge

Printed name and title

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

In the matter of the application for
authorization to search one (1) United
States Postal Service (USPS) Priority Mail
Parcel Tracking No.
9505511638565109059034
more fully described in Attachment A

Case No.: 4:25-mj-00040 PK

APPLICATION IN SUPPORT OF
APPLICATION FOR SEARCH
WARRANT

The Honorable Paul Kohler
United States Magistrate Judge

AFFIDAVIT

I, Solomon Ettinger, being duly sworn, hereby depose and say:

1. Your affiant, USPIS Task Force Officer Solomon Ettinger, is a POST certified and sworn peace officer in the state of Utah, since 2017. I am currently assigned as a Detective with the Utah County Major Crimes Task Force, and a Task Force Officer with the United States Postal Inspection Service. I specialize in narcotics investigations. Along with my POST certification, I successfully completed a Field Training Officer program, and am a member of the SWAT team. I have experience investigating crimes such as Theft, Criminal Mischief, DUI, Fraud, Domestic Violence, and other Utah Criminal Code violations. I have training and experience in the identification of drugs

as well as their methods of use and distribution. Your affiant has training and experience in identifying signs of impairment related to drugs and alcohol. I have experience in search warrants related to suspects using and/or distributing illegal substances and executing them as a member of the Provo Police Department and Utah County Major Crimes Task Force. As a result of my training and experience, I am familiar with methods employed by individuals engaged in various illegal activities, including, production, transportation, distribution, and use of illegal substances.

2. I am currently assigned to investigate a variety of federal violations to include controlled substances being transported via the United States Mails. As part of my duties as a Postal Inspector Task Force Officer, I investigate crimes involving the United States Mail including Title 18, United States Code, Section 1716, Nonmailable Matter, Title 21, United States Code, Sections 841(a)(1), Possession with Intent to Distribute a Controlled Substance, 843(b), Unlawful use of a Communication Facility to Facilitate the Distribution of a Controlled Substance, and Title 18 United States Code, Section 1956, Laundering of monetary instruments. The facts and information contained in this affidavit have been obtained by me personally or provided to me by other law enforcement officers and postal employees. Since this affidavit is being submitted for the limited purpose of securing a search warrant from the court, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the search warrant.

3. Based on my training and experience, I am aware that the United States Postal Service mail system is frequently used to transport illicitly used drugs, including controlled substances, and money associated with drug trafficking and other illicit activities to areas throughout the United States. I also know that many subjects prefer mail/delivery services such as Priority Mail because of the reliability and the ability to track the article's progress to the intended delivery point. The fast delivery time with Priority Mail is a big draw for senders of illicit money and drug parcels to get the items delivered in the least amount of time possible to avoid detection by law enforcement. Priority Mail is usually delivered within 1-3 days, which is a big draw for drug traffickers to get the product in their buyer's hands. USPS processes millions of Priority Mail parcels which is a draw to drug traffickers since their drug parcel will be mixed in with such a high volume of other parcels. When a drug trafficker learns that a mailed article has not arrived as scheduled, he/she often becomes suspicious of any delayed attempt to deliver the item and may decline the parcel in fear that law enforcement is monitoring the delivery.
4. Based on my training and experience regarding the use of Priority Mail for the transportation of controlled substances and illicit proceeds through the U.S. Mail, I know these types of mailings often bear the following characteristics:
 - a. Fictitious names, alternate addresses, or incomplete names and/or addresses in an attempt to conceal their identity from law enforcement, most often by the sender of the parcel.

- b. Drug traffickers often use Post Offices for shipment further away from their place of residence or return address as the return addresses is often chosen at random.
 - c. Cash payment for shipping to avoid detection by law enforcement.
- 5. Based on my training and experience, I know drug traffickers and their associates will often use fictitious names or incomplete names and/or addresses in an attempt to conceal their identity from law enforcement. Address verifications are conducted, and the return addresses listed on the articles are often either fictitious or sender names are not associated with the address.
- 6. This affidavit is made in support of an application for a search warrant on one (1) United States Postal Service Priority Mail parcel packaged in a white Medium Flat Rate box (SUBJECT PARCEL). The SUBJECT PARCEL is believed to contain illicit money or drugs as part of a drug trafficking scheme. The SUBJECT PARCEL is described as follows:
 - a. A United States Postal Service Priority Mail Parcel Tracking No. **9505511638565109059034**, addressed to “Cecilia Lizet Martinez Chavez” 517 S Casa Loma Ln, Cedar City, UT 84720 bearing a return address of “46 Dolores Ave. CA. 95076” shipped on April 19, 2025, from Capitola, California via the United States Postal Service (USPS) weighing 2 lb, 1.2 oz; with a shipment cost of \$19.15.

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BACKGROUND INVESTIGATION

1. On April 21, 2025, I was conducting parcel interdiction activities utilizing USPS business record lists of parcels coming into Salt Lake City at a USPS processing facility located in Salt Lake City. I found the SUBJECT PARCEL suspicious due to several characteristics consistent with drug trafficking through the mail.
2. I found the SUBJECT PARCEL return address of “46 Dolores Ave. CA. 95076” to be suspicious in nature after seeing no return name listed as is common with the general public, and no return city listed. I checked the address using open source mapping services and USPS business records and found the address with that zip code to be in Watsonville, CA. I found Watsonville to have its own post office only a few minutes away from the return address, but the parcel was shipped from Capitola, which is a 30-minute drive. From my training and experience, I believe the return address is false and used at random to thwart law enforcement investigations as is common in drug trafficking through the mail. I believe the lack of return name and return city are deliberate to conceal the senders’ identity as is common with drug trafficking through the mail.
3. I noted in further research of USPS business records that the recipient address of “Cecilia Lizet Martinez Chavez” 517 S Casa Loma Ln, Cedar City, UT 84720 has received two other parcels, both paid in cash from Las Vegas, Nevada. I know from my training and experience that Las Vegas is considered a source state for narcotics entering the State of Utah. I noted that the

SUBJECT PARCEL originated in California which I know from my training and experience is a source state for narcotics entering into the United States and the State of Utah.

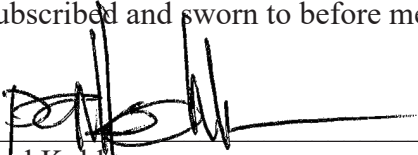
4. I know from my training and experience that those involved in drug trafficking through the mail will often pay for postage in cash as it is harder to track and can hide the distributor from law enforcement detection. The SUBJECT PARCEL had the postage paid in cash.
5. On April 22, 2025, I intercepted the parcel at the Cedar City Post Office. I met with Iron County K-9 Deputy Rohmann at the Cedar City Post Office to conduct a K-9 drug odor detection of the SUBJECT PARCEL. I placed three boxes which gave the appearance of being parcels on the ground in a line along with the SUBJECT PARCEL. I did not inform K-9 Deputy Rohmann which parcel was believed to contain illegal drugs. K-9 Rohmann conducted a drug detection sniff of the SUBJECT PARCEL and the other parcels with his K-9 Vojak. K-9 Deputy Rohmann reported that K-9 Vojak showed a positive alert on the SUBJECT PARCEL, and an indication for the odor of illicit narcotics.
6. K-9 Deputy Rohmann is a certified Peace Officer in the State of Utah and certified through POST with K-9 Vojak in February, 2025. K-9 Vojak is certified in detecting the presence of methamphetamine, heroin, cocaine, MDMA, and ecstasy.
7. Based on the aforementioned facts, your Affiant believes there is probable cause that the SUBJECT PARCEL described in Paragraph No. 6a contains controlled substances and/or proceeds from the trafficking of controlled

substances, or other illegal activities that involve the movement of drugs or currency that would have the smell of drugs, constituting evidence of violations of Title 18, United States Code, Section 1716, Nonmailable Matter, Title 21, United States Code, Sections 841(a)(1), Possession with Intent to Distribute a Controlled Substance, 843(b), Unlawful use of a Communication Facility to Facilitate the Distribution of a Controlled Substance.



Solomon G. Ettinger
USPIS Task Force Officer

Subscribed and sworn to before me on this 22nd day of April, 2025.



Paul Kohler
United States Magistrate Judge

Attachment A

One (1) Priority Mail parcel tracking number **9505511638565109059034** described as a white Medium Flat Rate box measuring approximately 12"x3.5"x14" addressed to "Cecilia Lizet Martinez Chavez" 517 S Casa Loma Ln, Cedar City, UT 84720 bearing a return address of "46 Dolores Ave. CA. 95076".

The parcel is being held at the Cedar City Post Office, Utah and has been held at the Cedar City Post Office, Utah since April, 22, 2025

Parcel image:

